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Remarks

Claims 1, 2 and 4-35 are pending. Reconsideration and allowance are requested in view of the above claims and the following remarks. This Supplemental Amendment is being filed to replace the Remarks in the Amendment filed December 1, 2003 with the following comments:

Claims 1, 2, and 4-35 are rejected under 35 U.S.C. 103(a) over Schrenk (US 4,910,707) in view of Berger et al. (US 5,225,706). This rejection is defective because Schrenk and Berger, taken alone or in combination, fail to teach each and every feature of the claims as required by 35 U.S.C. 103(a).

Claim 1 recites:

“A circuit arrangement (100) for protecting a chip arrangement (200), comprising:
at least one optosensitive detector unit (10), comprising at least one bipolar transistor, whose output voltage (V_{out}) is a measure of the incidence of light (L_i) on the detector unit (10), and
at least one comparator unit (20) preceded by the detector unit (10) provided for comparing the output voltage (V_{out}) of the detector unit (10) with a reference voltage (V_{ref}), wherein the data and/or functions of the chip arrangement (200) to be protected can be temporarily or permanently obstructed and/or erased (L) and/or blocked (S) and/or interrupted in the case of a failure message occurring during comparison of the output voltage (V_{out}) of the detector unit (10) with the reference voltage (V_{ref}).”

Schrenk fails to teach or suggest many features set forth in independent claim 1 (and corresponding independent method claim 25). For example, Schrenk does not teach or suggest the claimed “comparator unit (20) ... for comparing the output voltage (V_{out}) of the detector unit (10) with a reference voltage (V_{ref}).”

In the above-referenced Office Action, the Examiner alleges that Schenk's programming line 4 of memory area 1a corresponds to the claimed “comparator unit (20).” This is clearly incorrect. In Schenk, programming line 4 does not compare an output voltage of a photodiode 8 with a reference voltage to protect the data and/or functions of the memory area 1a. On the

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contrary, Schenk clearly discloses in col. 2, lines 52-55, that the programming line 4 is used to address all of the storage transistors 7 of a row of the memory area 1a. Further, FIGS. 1 and 2 of Schenk clearly show that programming line 4 is not connected in any way to any of the photo-diodes 8. Berger does not remedy this deficiency of Schenk.

It is not clear how Schenk's programming line 4 can perform the claimed comparison of the "output voltage (V_{out}) of the detector unit (10) with a reference voltage (V_{ref})" as set forth in claim 1. If the Examiner wishes to maintain the rejection, Applicants again request clarification of the Examiner's position with regard to this claim feature.

The Examiner also incorrectly equates the claimed "evaluation unit 30" for generating a failure message "when the output voltage (V_{out}) of the detector unit (10) deviates from a nominal range" (claim 11) with Schenk's selection transistor 6. Again, this is clearly incorrect. The selection transistor 6 of Schenk does not evaluate the output of the photo-diodes 8. Rather, the selection transistor 6 of Schenk is addressed by selection line 3, which, as shown in FIGS. 1 and 2 of Schenk, is not connected in any way to any of the photo-diodes 8.

Applicants respectfully submit that claims 1-2 and 4-35 are allowable because Schrenk and Berger, alone or in combination, fail to teach each and every feature of the claims as required by 35 U.S.C. 103(a).

If the Examiner believes that anything further is necessary to place the application in condition for allowance, the Examiner is requested to contact Applicants' undersigned attorney at the telephone number listed below.

Respectfully submitted,

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